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11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re:

15 PG&E CORPORATION,

16 - and -

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

19 Debtors.

- 20 • Affects PG&E Corporation
- 21 • Affects Pacific Gas and Electric Company
- 22 ☒ Affects both Debtors

23 ** All papers shall be filed in the Lead Case,*
24 *No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**CALIFORNIA STATE TEACHERS
RETIREMENT SYSTEM'S OPPOSITION
TO REORGANIZED DEBTORS' FIFTH
EXTENSION MOTION**

Hearing Information:

Date: November 15, 2022
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

25 California State Teachers Retirement System ("CalSTRS") hereby respectfully submits
26 this opposition to PG&E Corporation's and Pacific Gas and Electricity Company's (collectively,
27 the "Debtors") Motion for Entry of An Order Further Extending Deadline to the Reorganized
28 Debtors to Object to Claims and For Related Relief (the "Fifth Extension Motion") [Dkt. No.
13122]. In short, the Fifth Extension Motion and its supporting papers fail to provide sufficient

1 information for CalSTRS to understand the basis for Debtors seeking to extend the objection
2 deadline as to the Securities Claims.¹ As set forth below, the Fifth Extension Motion is either
3 incomplete or misleading as to the asserted “active negotiations in connection with a potential
4 global settlement with the help of an experienced mediator,” which includes the Securities
5 Claims. Fifth Extension Motion at 12:22-23.

7 Pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, the Court may
8 enlarge the time period for a party to perform “an act [that] is required or allowed to be done at or
9 within a specified period...for cause shown.” Fed. R. Bankr. P. 9006(b)(1). The “cause”
10 advanced by PG&E in its Fifth Extension Motion is the continued pursuit of a “global
11 settlement.” Fifth Extension Motion at 12-13. Yet the Fifth Extension Motion does not identify
12 the person or entity that is representing the interests of the Securities Claims holders, like
13 CalSTRS, or the “experienced mediator” who is purportedly conducting these “global settlement”
14 efforts that will resolve the Securities Claims and CalSTRS has not authorized anyone to
15 negotiate the resolution of its claims other than the undersigned.

17 To avoid burdening the Court with contested motion practice, CalSTRS sought to
18 investigate the “global settlement” assertions in Fifth Extension Motion and contacted both the
19 Securities Litigation class counsel and Debtors’ counsel for explanations as to these mystery
20 “global settlement” negotiations. Securities Litigation class counsel indicated it would
21 investigate further, but thereafter failed to respond to CalSTRS in any substantive way. Debtors’
22 counsel responded that it was in mediated settlement negotiations with Securities Litigation class
23 counsel, but refused to identify the mediator and did not address what, if any, negotiation
24 addresses a “global settlement” with respect to the Securities Claims. Thereafter, in a telephone
25 conference, Debtors’ counsel took the position that the mediated “global settlement” negotiations
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28 ¹ CalSTRS adopts the defined terms set forth in the Fifth Extension Motion.

1 incorporated CalSTRS' Securities Claims, but refused to identify the entity purportedly
2 representing CalSTRS' interests on the grounds of mediation confidentiality. Debtors' counsel
3 assured the undersigned that, if there was a global settlement including the Securities Claims,
4 CalSTRS could "opt out" if it was not satisfied with it. That is not enough.

5
6 It is impossible, on this information, for CalSTRS to know what settlement efforts have
7 been undertaken with respect to the Securities Claims and whether those efforts justify a further
8 extension of the objection deadline. As it stands, the Fifth Extension Motion admits the Debtors
9 have "paused" the ADR process established by the Court to resolve the Securities Claims pending
10 "global settlement" negotiations through a mediator, but the Fifth Extension Motion provides no
11 meaningful information for the Securities Claims holders to understand how their interests are
12 being adequately represented in the "global settlement" mediation process. In that failure, the
13 Fifth Extension Motion does not show cause for an extension of the objection deadline as to the
14 Securities Claims. Therefore, CalSTRS respectfully requests that this Court deny the Debtor's
15 Fifth Extension Motion as to the Securities Claims.
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17 **RESERVATION OF RIGHTS**

18 The California State Teachers Retirement System reserve all its rights, claims,
19 defenses, and remedies, including, without limitation, the right to amend, modify or
20 supplement this Opposition in accordance with applicable rules.
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1 Dated: November 8, 2022

2 Respectfully Submitted,

3 BLA Schwartz, P.C.

4 /s/ Irwin B. Schwartz

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